

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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LETICIA FRANCINE STIDHUM,

Plaintiff,

-against-

161-10 HILLSIDE AUTO AVE, LLC d/b/a Hillside
Auto Outlet, HILLSIDE AUTO MALL INC. d/b/a
Hillside Auto Mall, ISHAQUE THANWALLA,
JORY BARON, RONALD M. BARON, and
ANDRIS GUZMAN,

Defendants.

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Ishaque Thanwalla declares, pursuant to 28 U.S.C. § 1746, under penalty of perjury, that the following is true and correct:

1. I am a Defendant in this case, and am a member of 161-10 Hillside Auto Ave, LLC d/b/a Hillside Auto Outlet (hereinafter “Hillside Auto Outlet”).¹
2. As such, I am familiar with all the facts and circumstances heretofore had herein based upon my personal knowledge and a review of the documents I maintain at the Hillside Auto Outlet dealership.
3. I have conducted a search of my telephone to the best of my abilities for all text messages related to the Plaintiff.
4. Other than the text messages I have already produced, including that with a non-party to this case named Ali, I am not aware of any further responsive text messages that I am in possession, custody, or control of.

¹ Hillside Auto Mall Inc. d/b/a Hillside Auto Mall (“Hillside Auto Mall”) has been named a Defendant in this case, but I hold no interest in that dealership, and the Plaintiff in this case never worked there.

5. I have also searched my emails and am not in possession, custody, or control of any responsive emails other than those with my counsel, as well as three (3) blank emails attaching resumes from prospective sales representatives to myself, the Plaintiff, and others.

6. Similarly, I conducted a search for the weekly sales logs and am unable to find them.

7. Before we hired our current full-time controller, Deana Jennings (“Ms. Jennings”) – who worked and still works at Hillside Auto Mall – served as our controller part time until we found a full-time controller.

8. It is my understanding that Ms. Jennings was the controller during virtually the entire time period that Plaintiff worked at Hillside Auto Outlet from in or about May 2018 to in or about January 2019.

9. Ms. Jennings maintained the weekly sales logs and I understood that she was in possession of them.

10. Upon the request of my counsel, I asked Ms. Jennings for these logs but she informed me that she does not have them.

11. I searched the records we have at Hillside Auto Outlet and am unable to find these records.

12. I am uncertain as to where they may be stored and have no knowledge nor recollection as to where they are kept.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on May 17, 2023.

Ishaque Thanawalla
Ishaque Thanawalla (May 17, 2023 16:55 GMT+2)
Ishaque Thanwalla

2023-05-17 Thanwalla Declaration

Final Audit Report

2023-05-17

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